

# Holland & Knight

800 17th Street, NW, Suite 1100 | Washington, DC 20006 | T 202.955.3000 | F 202.955.5564  
Holland & Knight LLP | [www.hklaw.com](http://www.hklaw.com)

Dennis R. Hughes  
202.419.2448  
[dennis.hughes@hklaw.com](mailto:dennis.hughes@hklaw.com)

October 15, 2021

## **VIA IZIS**

Zoning Commission for the  
District of Columbia  
441 4<sup>th</sup> Street, NW, Suite 210S  
Washington, D.C. 20001

**Re: Z.C. Case No. 12-15C - Gallaudet University  
Proposed Amendment to 2012-2022 University Campus Plan  
Applicant's Supplemental Materials**

Dear Chairman Hood and Members of the Zoning Commission:

On behalf of Gallaudet University ("Gallaudet" or the "Applicant"), we respectfully submit these materials for your consideration in advance of the November 4 public hearing scheduled for this application. These materials are provided pursuant to Subtitle Z Section 401.5 of the Zoning Regulations (11 DCMR, 2016) as a supplement to the application materials originally filed in this matter and include a complete package of refined architectural drawings and plans which are proposed to supersede and replace the package of drawings included at Exhibit 5 of the hearing record.

### **Enclosed Exhibits:**

- A. Revised Campus Plan Amendment drawings and plans package;
- B. Resumes of prospective expert witnesses and Outlines of prospective witness testimony.

### **Summary of Requested Amendments to Approved Campus Plan:**

As detailed in its Statement in Support included at Exhibit 3 of the hearing record, the University is requesting a limited series of amendments to its approved 2012-2022 campus plan (the "Campus Plan"), with a focus on opening the campus and connecting the University more meaningfully to the surrounding neighborhoods, more actively engaging the community and sharing the unique Deaf culture that exists nowhere else in the world to the extent it does at the University's campus.

A primary driver of the current Campus Plan amendment application is the further development of the multi-phased planned unit development ("PUD") outside the residential campus, along 6th Street, NE (Zoning Commission Case No. 15-24B). There, the University is partnering with JBG Smith to dramatically improve the corridor leading to Union Market with a multi-phased mixed use residential, retail, service and university use PUD across four separate University-owned parcels.

In coordination with this PUD program, the University is proposing to create a new park-like promenade along the western boundary of the campus tentatively referenced as "Creativity Way". This space will be publicly-accessible during daylight hours and will contain a series of active and passive park-like features, extensive landscaping and hardscaping, outdoor art features and meaningful connections between the historic University campus and the surrounding neighborhoods through dramatic architectural features, signage and other wayfinding mechanisms. See Sheets 16-35 of the attached drawings at [Exhibit A](#).

Another Campus Plan amendment element related to the development of the PUD and the University's efforts to better connect the campus to the community is a proposed slight reconfiguration of Tapscott Street, a University-owned service road accessing 6th Street, NE, to create a pedestrian-prioritized meander leading between Creativity Way and the historic campus to the east as well as to improve the footprint configuration of the Parcels 2 and 3 buildings in the adjacent PUD, as was contemplated by the Zoning Commission in its original PUD approval. The land area of the proposed segment of Tapscott Street to be abandoned and relocated measures approximately 6,000 square feet and is proposed to be removed from the controls of the Campus Plan and included as part of the adjacent PUD and be rezoned consistent with the PUD, all as part of the pending PUD application No. 15-24B. See Sheets 36-39 of the attached drawings at [Exhibit A](#).

In addition to these PUD-related amendments, a memorial garden commemorating the history of the Black Deaf experience at Gallaudet, to be dedicated the "Louise B. Miller Pathways and Gardens", is proposed by the University to be located just to the northeast of Creativity Way and connected via hardscaping along the curvature of the relocated Tapscott Street. See Sheets 40-44 of the attached drawings at [Exhibit A](#).

Finally, the University requests a five-year extension of the approved Campus Plan to allow the University to undertake necessary comprehensive planning and stakeholder outreach to determine the University's longer term needs and priorities, an exercise which has been significantly impacted by the extended COVID-19 health emergency.

### **Creativity Way Refinements:**

Over the course of the past several weeks following submission of the application, the University has continued to study and refine its plans for Creativity Way with a goal toward making it more welcoming, more successful in presenting Gallaudet's unique culture to the community, more visible to the public, more integrated with the University's programming in the spaces within the

PUD buildings that will open onto Creativity Way and, overall, a more engaging and successful open space feature.

This further study has included discussions with, and input from, the Office of Planning, from the University's Creativity Way Steering Committee, and from the surrounding communities through the Advisory Neighborhood Commissions. This engagement has resulted in a design for Creativity Way that is a much better defined, more cohesive, and more inviting open space to be utilized not only by the University community but by the surrounding neighborhood and visitors.

The enclosed updated drawings for Creativity Way show further development of Creativity Way in terms of visitor experience, landscaping and hardscape refinement and additional details, wayfinding and connectivity to other parts of the campus, and efforts to provide necessary campus security in a thoughtful and discreet fashion.

The original plans for Creativity Way conceived of a series of portals and a central pavilion composed of dynamic sculptural elements. As the updated drawings demonstrate, the University has advanced this concept to better reflect Deaf culture motifs, important sightlines and DeafSpace principles. The sculptural features along Creativity Way also have been expanded in number and design to better tie in the promenade to the activated University ground floor spaces within the Parcel 2 PUD building bordering Creativity Way on its west.

The central pavilion has been redesigned and relocated from the center of the promenade to its eastern edge so as to afford distant sightlines across the entire span of the linear open space. The redesign of the various portals and pavilions has been accomplished to include integrated roof plantings and locations for banners to improve signage and wayfinding. Certain of the pavilions also have been equipped with retractable screens to provide shelter during inclement weather.

The refinements also have included significant additional detail with regard to contemplated paving and plantings, outdoor art installations and colors and materials palette. The drawings attached at [Exhibit A](#) are intended to provide the Commission a sense of the scope, design and feel contemplated for this important publicly-accessible open space, which the University is also proposing to serve as an open space benefit to the neighboring PUD.

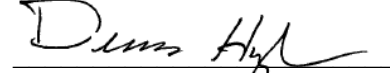
### **Campus Plan Amendments:**

The University's most recent Campus Plan was approved by the Zoning Commission pursuant to Order No. 12-15. Included among the findings of fact in that Order were a series of approved Campus Plan improvements identified and summarized as contemplated to be executed in three phases over the course of the period of approval. To the extent appropriate, the Applicant requests that all said references to "Sixth Street and Florida Avenue" development, "Sixth Street mixed-use development", "Campus Gateway" and similar references predating the current plans for Creativity Way and the adjacent multi-phased PUD be updated to reflect and incorporate the amendments proposed herein and that the period of validity of the Campus Plan be revised to reflect December 31, 2027.

Thank you for your consideration of these additional materials in advance of the November 4 public hearing.

Respectfully submitted,

HOLLAND & KNIGHT LLP

A handwritten signature in black ink, appearing to read "Dennis Hughes", written over a horizontal line.

Dennis R. Hughes, Esq.

cc : Certificate of Service

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 15, 2021, electronic copies of Gallaudet University's supplemental prehearing materials were delivered as follows:

**D.C. Office of Planning**

Ms. Jennifer Steingasser

Mr. Joel Lawson

Mr. Stephen Mordfin

[jennifer.steingasser@dc.gov](mailto:jennifer.steingasser@dc.gov)

[joel.lawson@dc.gov](mailto:joel.lawson@dc.gov)

[stephen.mordfin@dc.gov](mailto:stephen.mordfin@dc.gov)

**Advisory Neighborhood Commission 5D**

Commissioner Sydelle Moore, Chairperson

Commissioner Sebrena Rhodes, SMD 5D01

[5D05@anc.dc.gov](mailto:5D05@anc.dc.gov)

[5D01@anc.dc.gov](mailto:5D01@anc.dc.gov)

**Advisory Neighborhood Commission 6A**

Commissioner Amber Grove, Chairperson

Commissioner Keya Chatterjee, SMD 6A01

[6A04@anc.dc.gov](mailto:6A04@anc.dc.gov)

[6A01@anc.dc.gov](mailto:6A01@anc.dc.gov)

**Advisory Neighborhood Commission 6C**

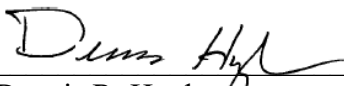
Commissioner Karen Wirt, Chairperson

Commissioner Drew Courtney, SMD 6C06

[6C@anc.dc.gov](mailto:6C@anc.dc.gov)

[6C02@anc.dc.gov](mailto:6C02@anc.dc.gov)

[6C06@anc.dc.gov](mailto:6C06@anc.dc.gov)

  
Dennis R. Hughes